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DYNAMIC LEDGER SOLUTIONS, INC.

16 UNITED STATES DISTRICT COURT
17
NORTHERN DISTRICT OF CALIFORNIA
18
SAN FRANCISCO DIVISION

19 BRUCE MACDONALD, Individually and on
20 behalf of all others similarly situated,

21 Plaintiff,

22 v.

23 DYNAMIC LEDGER SOLUTIONS, INC., a
Delaware corporation, TEZOS STIFTUNG, a
Swiss foundation, KATHLEEN BREITMAN,
24 an individual, ARTHUR BREITMAN, an
individual, TIMOTHY COOK DRAPER, an
individual, DRAPER ASSOCIATES,
JOHANN GEVERS, DIEGO PONZ, GUIDO
25 SCHMITZ-KRUMMACHER, BITCOIN
SUISSE AG, NIKLAS NIKOLAJSEN and
DOES 1-100, INCLUSIVE,

26 Defendants.

27 Case No. 3:17-cv-07095-RS

28 **JOINT STIPULATION REGARDING
SERVICE AND EXTENDING
TIME FOR DYNAMIC LEDGER
SOLUTIONS INC., KATHLEEN
BREITMAN, AND ARTHUR
BREITMAN TO RESPOND TO
COMPLAINT**

Judge: Hon. Richard Seeborg

1 Defendants Dynamic Ledger Solutions, Inc. (“DLS”), Kathleen and Arthur Breitman (the
2 “Breitmans”) and plaintiff Bruce MacDonald (“MacDonald”) (collectively, the “Appearing Parties”)
3 stipulate pursuant to Civil L. R. 6-1(a) to extend the time for DLS and the Breitmans to respond to the
4 putative class action complaint filed by MacDonald (the “Complaint”) (Dkt. No. 1) in the above-
5 captioned action and to resolve issues related to service as follows:

6 WHEREAS, on December 13, 2017, MacDonald filed the Complaint;

7 WHEREAS, on December 19, 2017, MacDonald purportedly served DLS with a summons and
8 Complaint;

9 WHEREAS, DLS contests the validity of the purported service;

10 WHEREAS, MacDonald has not yet served the Breitmans with a summons and Complaint;

11 WHEREAS, the Appearing Parties have met and conferred regarding the topic of service;

12 WHEREAS, in order to avoid motion practice with respect to service and for purposes of
13 judicial efficiency, DLS and the Breitmans agree to waive service of the summons and Complaint as
14 of the date of this Stipulation;

15 WHEREAS, the parties further agree that any prior deadline to respond to the Complaint is
16 vacated and pursuant to Civil L. R. 6-1(a), DLS and the Breitmans do not have any obligation to
17 respond to the Complaint until 60 days after the date of this stipulation (March 6, 2018);

18 WHEREAS, this stipulated extension will not alter the date of any event or any deadline
19 already fixed by order of this Court; and

20 WHEREAS, there have not been any previous time modifications in this case.

21 NOW, THEREFORE, the Appearing Parties, hereby stipulate as follows:

22 1. DLS and the Breitmans shall waive service of the summons and Complaint; and
23 2. DLS and the Breitmans shall not be required to move to dismiss or otherwise respond
24 to the Complaint until 60 days after the date of this stipulation (March 6, 2018).
25 Pursuant to Civil L. R. 6-1(a), this paragraph shall be effective upon the filing of this
26 Stipulation with the Court.

27 **IT IS SO STIPULATED.**

1 Dated: January 5, 2018

2 **HAGENS BERMAN SOBOL SHAPIRO LLP BAKER MARQUART LLP**

3

4 */s/ Reed R. Kathrein*
5 Reed R. Kathrein (139304)

/s/ Brian E. Klein
6 Brian E. Klein (258486)

7 Attorney for Plaintiff MacDonald

8 Attorney for Defendants DYNAMIC
9 LEDGER SOLUTIONS, INC., KATHLEEN
10 BREITMAN, and ARTHUR BREITMAN

11 **COOLEY LLP**

12 */s/ Patrick E. Gibbs*
13 Patrick E. Gibbs (183174)

14 Attorney for Defendant
15 DYNAMIC LEDGER SOLUTIONS, INC.,

16 **FILER'S ATTESTATION**

17 Pursuant to Civil Local Rule 5-1(i)(3), regarding signatures, Patrick E. Gibbs hereby attests
18 that concurrence in the filing of this document has been obtained from all the signatories above.

19 Dated: January 5, 2017

COOLEY LLP

20 */s/ Patrick E. Gibbs*
21 Patrick E. Gibbs